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**ATTORNEYS FOR PLAINTIFF**  
**UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF MONTANA**  
**BILLINGS DIVISION**

<b>UNITED STATES OF AMERICA,</b> <b>Plaintiff,</b>  <b>vs.</b>  <b>DANIEL JIMINEZ-CHAVEZ aka</b> <b>Ratón, WENDELL LEFTHAND,</b> <b>FREDERICA LEFTHAND, RANITA</b> <b>ROSELLE REDFIELD, MELANIE</b> <b>ROSE BLOODMAN, RODERICK</b> <b>PLENTYHAWK, CARLY JOY</b> <b>JAMES, JEFFREY PRETTYPAINT,</b> <b>DARLON RICHARD LEFTHAND,</b> <b>KEILEE SHAMBRAE DIAZ,</b> <b>ZACHARY DOUGLAS BACON,</b> <b>MORGAN LUKE HUGS, and</b> <b>ANTHONY SPRINGFIELD,</b>  <b>Defendants.</b>	<b>CR 23-41-BLG-SPW</b>          <b>UNITED STATES' NOTICE OF</b> <b>COMPLEX CASE</b>
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The United States of America, represented by Bryan T. Dake and Julie R. Patten, files this Notice advising the Court that the government believes this is a complex case within the meaning of 18 U.S.C. § 3161(h)(7)(B)(ii) based on the volume and scope of discovery and the number of defendants currently charged.

1. The Volume and Scope of Discovery. The discovery in this case is voluminous, particularly as it relates to the amount of digital discovery. The discovery includes, among other things, thousands of pages of discovery, multiple spreadsheets (without Bates numbers), as well as hours of both audio recordings and digital recordings. Much of this material will be designated sensitive material requiring certain protections, such as scheduling time to review the materials at the U.S. Attorney's Office, or at with investigating agency in Billings, Montana. The government is working diligently on producing the discovery, with first production anticipated by the deadline of April 28, 2023. The government anticipates several productions of supplemental discovery as some discovery is still outstanding. All supplemental discovery will be produced promptly.
2. The Number of Defendants Currently Charged. There are currently 15 defendants charged in this case, and five additional defendants charged in related case numbers CR-23-38-BLG-SPW, CR-22-14-BLG-SPW, and CR-23-37-BLG-SPW. The government anticipates the defendants in all four cases will require significant time to review the discovery.

For the reasons stated above, the government anticipates a request to continue the previously imposed deadlines to which there will be no objection. At that time, the government will confer with defense counsel about a joint motion for designation of the case as complex pursuant to 18 U.S.C. §§ 3161(h)(7)(A), as well as a request for a pretrial conference for scheduling purposes and to avoid any unnecessary delay.

DATED this 27th day of April, 2023.

JESSE A. LASLOVICH  
United States Attorney

/s/ Bryan T. Dake  
BRYAN T. DAKE  
Assistant U.S. Attorney

/s/ Julie R. Patten  
JULIE R. PATTEN  
Assistant U.S. Attorney